

Transmitted via E-mail

July 21, 2017

Mr. Brandon Pursel (pursel.brandon@epa.gov)  
U.S. Environmental Protection Agency, Region 5  
Land and Chemicals Division  
77 West Jackson Blvd., DE-9J  
Chicago, IL 60604-3590

RE: First Half 2017 Progress Report  
Performance-Based Administrative Order on Consent  
RCRA Corrective Action  
Flint West Facility #12990  
Flint, Michigan  
USEPA ID No. MIK204011722<sup>A</sup>

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Dear Mr. Pursel:

In accordance with paragraph 24.b. of the Performance-Based Administrative Order on Consent, Docket No. 05-2011-0021 (AOC), between the U.S. Environmental Protection Agency Region 5 (USEPA) and the Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the first half of 2017 (January 1, 2017 through June 30, 2017).

Please contact me if you would like to discuss this matter further. Thank you.

Sincerely,



Michael Smith  
Technical Services Manager

A - Note that this facility is identified as USEPA ID No. MID005356654 in the Administrative Order on Consent for this facility. However, the correct USEPA ID No. is MIK204011722.

Attachment A - First Half 2017 Progress Report

C: Grant Trigger, RACER  
David Favero, RACER

ATTACHMENT A  
FIRST HALF 2017 PROGRESS REPORT  
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT  
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN  
January 1, 2017 to June 30, 2017

WORK PERFORMED THIS PERIOD

- Submitted the Second Half 2016 Progress Report to USEPA on January 12, 2017.
- Disposed of three 55-gallon drums of investigation-derived waste (February 17, 2017).
- Prepared and submitted a Data Report to USEPA on February 21, 2017, which summarized the October/November 2016 groundwater monitoring event.
- Submitted to the Michigan Department of Environmental Quality (MDEQ) on March 6, 2017, the October 7, 2016, Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test and discussed MDEQ comments on the plan on April 6, 2017.
- Submitted to USEPA on May 12, 2017, a draft addendum to the Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test to address MDEQ comments on the plan.
- Gauged all wells except MW-108S, MW-109S and MW-110S. These wells are located on the abandoned railroad parcel to the north, which we have been informed was recently acquired by the Genesee County Parks Administration. RACER is currently pursuing a site access agreement. No NAPL was encountered.
- Sampled all wells (with the exception of MW-108S, MW-109S and MW-110S) on June 13, 2017. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Received data from laboratory for wells gauged and sampled in June 2017. The data will be submitted in a Data Report in July, 2017. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc.

#### PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- Due to a change in ownership, the abandoned railroad parcel north of the Site is not currently accessible to RACER. RACER is in the process of pursuing a site access agreement for this property.

#### ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- RFI Phase II Sampling Matrix Preparation and Fieldwork Implementation  
(Proposed 2012 activities) 100%  
  
The 2012 portions of the proposed Phase II investigation included in the June 26, 2012, Phase I Data Report were completed and included the completion and sampling of 13 soil borings, eight of which were finished as monitoring wells. Soil and groundwater samples (from the 8 new and 5 previously-installed monitoring wells) were collected and were analyzed for ten MDEQ Metals including Chromium VI, VOCs (USEPA 8260), and PNAs (USEPA 8310).
- RFI Phase II Data Report Preparation 100%  
(Submitted February 12, 2013)
- Human Health EI (CA725) Report 100%  
(Submitted July 1, 2013)
- Data Report Preparation 100%  
(Additional investigations and groundwater monitoring)  
(Submitted July 9, 2013)
- Data Report Preparation 100%  
(Additional well installation and groundwater monitoring)  
(Submitted October 12, 2013)
- Groundwater Migration under Control EI (CA750) 100%  
(Submitted March 1, 2014)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted March 18, 2014)
- Data Report Preparation 100%  
(April, 2014 additional investigations and groundwater monitoring)  
(Submitted June 23, 2014)

- Data Report Preparation 100%  
(June, 2014 groundwater monitoring and July 2014 additional soil investigations)  
(Submitted October 3, 2014)
- Draft Corrective Measures Proposal 100%  
(Submitted November 1, 2014)
- Data Report Preparation 100%  
(December, 2014 additional soil investigation and groundwater monitoring)  
(Submitted February 13, 2015)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 12, 2015)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted February 23, 2016)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 3, 2016)
- Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test Preparation 100%  
(Submitted October 7, 2016)
- Data Report Preparation 100%  
(Groundwater monitoring - October and November, 2016)  
(Submitted February 21, 2017)

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Finalize and submit a Data Report for the June 2017 groundwater sampling. (July, 2017)
- Gauge and sample monitoring wells (analyze for VOCs and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc) in Third Quarter, 2017.
- Review, discuss and respond to any USEPA comments on the draft Corrective Measures Proposal, Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test, or Data Reports. Respond to MDEQ comments on the Draft Work Plan for HRC Pilot Test.
- Implement Hydrogen Release Compound (HRC) Pilot Test (to be determined).

- Prepare and submit a Corrective Measures Implementation (CMI) Work Plan within 90 days of approval of the selected corrective measures alternative. The CMI Work Plan will include a draft Declaration of Restrictive Covenant, details for the HRC injection, details for groundwater monitoring, and an implementation schedule. (Depending on the schedule of and comments from USEPA's and MDEQ's review of the CMP.)
- Prepare summaries of meetings, data reviews, or conference calls with USEPA and MDEQ, and Data Report(s), as appropriate.